



TRS Labs, Inc.
PO Box 5112
Athens, GA 30604

CITATION AND NOTIFICATION OF PENALTY

We believe that you violated the Animal Welfare Act (7 U.S.C. § 2131 et seq.) (AWA), as described below.

Date of Violation: March 8, 2012

9 C.F.R. § 2.33(b)(2) Attending veterinarian and adequate veterinary care.

(b) Each research facility shall establish and maintain programs of adequate veterinary care that include:

(2) The use of appropriate methods to prevent, control, diagnose, and treat diseases and injuries, and the availability of emergency, weekend, and holiday care;

TRS Labs, Inc. (TRS) failed to provide adequate veterinary care and use appropriate methods to prevent, control, diagnose, and treat diseases and injuries. APHIS observed an enclosure housing 3 gerbils, including 1 gerbil that was laterally recumbent and moribund with difficulty breathing. A closer inspection revealed severe bite wounds to its back and sides requiring euthanasia.

Date of Violation: March 8, 2012

9 C.F.R. § 3.1(a) Housing facilities, general.

(a) Structure; construction. Housing facilities for dogs and cats must be designed and constructed so that they are structurally sound. They must be kept in good repair, and they must protect the animals from injury, contain the animals securely, and restrict other animals from entering.

TRS failed to maintain a structurally sound facility, kept in good repair, to protect animals from injury. APHIS observed a crack in the concrete floors which had previously been filled in, but was beginning to chip. APHIS also observed a ceiling panel in a dog room that had become detached, and a metal divider panel between dog runs that had jagged edges at the top.



Date of Violation: On or about June 4, 2012

9 C.F.R. § 2.33(b) Attending veterinarian and adequate veterinary care.

(b) Each research facility shall establish and maintain programs of adequate veterinary care that include:

(2) The use of appropriate methods to prevent, control, diagnose, and treat diseases and injuries, and the availability of emergency, weekend, and holiday care;

(3) Daily observation of all animals to assess their health and well-being; Provided, however, That daily observation of animals may be accomplished by someone other than the attending veterinarian; and Provided, further, That a mechanism of direct and frequent communication is required so that timely and accurate information on problems of animal health, behavior, and well-being is conveyed to the attending veterinarian;

TRS failed to provide adequate veterinary care and use appropriate methods to prevent, control, diagnose, and treat diseases and injuries to animals in the facility, to observe all animals in the facility on a daily basis to assess their health and well-being, and to convey information on problems of animal health, behavior, and well-being to the attending veterinarian in a timely manner. APHIS observed the following:

- 1) A dog (USDA identification #073) with a dime size wound on the right shoulder with a thick yellowish tan liquid oozing from the wound, and reddened gums along with thick greenish gray concretions on its teeth;
- 2) A dog (USDA identification #483) was moderately thin with margins of the ribs easily observed and abnormally loose stool in its run;
- 3) A dog (USDA identification #449) had an open cut on the pad of the right front paw that was moist and reddened;
- 4) A dog (USDA identification #266) had a large mass approximately 5 cm in diameter under the angle of the left jaw;
- 5) A dog (USDA identification #270) had a red swollen right rear foot that was warm to the touch;
- 6) A dog (USDA identification #102) had bilateral corneal opacity and a thick clear mucoid exudate on the surface of both eyes;
- 7) A dog (USDA identification #031) had a small cherry eye in the inner corner of the right eye;
- 8) A dog (USDA identification #011) had a small cherry eye in the inner corner of the left eye;
- 9) A dog (USDA identification #084) had redness and swelling around the ear canal;
- 10) A dog (USDA identification #106) had severe swelling around the ear canal with raised proliferative tissue forming ridges around the opening;
- 11) A dog (USDA identification #876) had scabs in the inner surfaces of both ears and the distal half of the left ear was thickened to the touch;
- 12) A dog (USDA identification #212) had long curving dewclaws almost growing into the pad of the foot;
- 13) A dog (USDA identification #213) had long curving dewclaws almost growing into the pad of the foot;
- 14) Three (3) dogs (USDA identification #073, 079, and 074) had significantly



reddened gums along with thick greenish gray concretions on multiple teeth;
15) Twenty-six (26) dogs (USDA identification #092, 078, 072, 094, 097, 087, 102, 093, 071, 096, 106, 091, 088, 077, 085, 275, 011, 031, 964, 193, 266, 157, 870, 876, 274, and 666) had thick greenish gray concretion on multiple teeth;
16) At least 3 dogs (USDA identification #471, 482, 112) had reddened, irritated lesions on their skin; and
17) At least 10 dogs (USDA identification #491, 485, 394, 075, 080, 081, 077, 085, 097, 087) had inter-digital cysts.

Date of Violation: June 4, 2012

9 C.F.R. § 3.2(d) Indoor housing facilities.

(d) Interior surfaces. The floors and walls of indoor housing facilities, and any other surfaces in contact with the animals, must be impervious to moisture. The ceilings of indoor housing facilities must be impervious to moisture or be replaceable (e.g., a suspended ceiling with replaceable panels).

TRS failed to ensure ceilings of indoor housing facilities were impervious to moisture. APHIS observed water dripping from the ceiling in Room “B” over the walkway to the dog runs. It was raining during this inspection and the manager stated there was a leak in the roof.

Date of Violation: June 4, 2012

9 C.F.R. § 3.6(a)(2)(i) Primary enclosures.

Primary enclosures for dogs and cats must meet the following minimum requirements:

(a) General requirements.

(2) Primary enclosures must be constructed and maintained so that they:

(i) Have no sharp points or edges that could injure the dogs and cats;

TRS failed to ensure primary enclosures were constructed in such a manner that they had no sharp points or edges that could injure dogs. APHIS observed that Room “A,” dog run #35, had numerous sharp wires protruding into the run at a level accessible to the dogs.

Date of Violation: June 4, 2012

9 C.F.R. § 3.128 Space requirements.

Enclosures shall be constructed and maintained so as to provide sufficient space to allow each animal to make normal postural and social adjustments with adequate freedom of movement. Inadequate space may be indicated by evidence of malnutrition, poor condition, debility, stress, or abnormal behavior patterns.

TRS failed to provide sufficient space to allow each animal to make normal postural and social adjustments with adequate freedom of movement. APHIS observed 17 gerbils that were housed in an enclosure that was approximately eight by sixteen inches (8” X 16”), and that were overcrowded.



Date of Violation: July 9, 2012

9 C.F.R. § 3.6(a)(2)(ii) Primary enclosures.

Primary enclosures for dogs and cats must meet the following minimum requirements:

- (a) General requirements.
- (2) Primary enclosures must be constructed and maintained so that they:
 - (ii) Protect the dogs and cats from injury;

TRS failed to have primary enclosures constructed and maintained in a manner that protects dogs from injury. APHIS observed that a white plastic divider panel had become detached from the chain link on the inside of an enclosure in room "A." The shield was loose at the top leaving a gap between it and the chain-link fence. The panel flapped or bounced against the enclosure fence when the dogs jumped against it.

Date of Violation: July 9, 2012

9 C.F.R. § 3.133 Separation.

Animals housed in the same primary enclosure must be compatible. Animals shall not be housed near animals that interfere with their health or cause them discomfort.

TRS failed to ensure all animals in the same primary enclosure were compatible. APHIS observed 2 gerbils in room "H" that were fighting in their enclosure. Both animals sustained injuries.

Date of Violation: March 20, 2013

9 C.F.R. § 2.33(b)(2) Attending veterinarian and adequate veterinary care.

- (b) Each research facility shall establish and maintain programs of adequate veterinary care that include:
 - (2) The use of appropriate methods to prevent, control, diagnose, and treat diseases and injuries, and the availability of emergency, weekend, and holiday care;

TRS failed to provide adequate veterinary care and use appropriate methods to prevent, control, diagnose, and treat diseases and injuries to the animals in the facility. APHIS observed a dog (USDA Identification #438) with swelling and bleeding between two toes of the left hind paw caused by a lesion.

Date of Violation: March 20, 2013

9 C.F.R. § 3.6(a)(2)(x) Primary enclosures.

Primary enclosures for dogs and cats must meet the following minimum requirements:

- (a) General requirements.
- (2) Primary enclosures must be constructed and maintained so that they:
 - (x) Have floors that are constructed in a manner that protects the dogs' and cats' feet and legs from injury, and that, if of mesh or slatted construction, do not allow the dogs' and cats' feet to



pass through any openings in the floor;

TRS failed to provide primary enclosures that do not allow cats' feet to pass through any openings in the floor. APHIS observed dog enclosures being used to house cats. The slats in the floors of these enclosures were wide enough to allow the feet of the cats to pass through them.

The penalty for the alleged violation(s) described above is \$26,179.